

## REMARKS

Claims 1, 4 - 18 and 22 - 28 are presently pending. In the above-identified Office Action, the Examiner rejected Claims 1, 4, 5, 7 - 10, 12 - 15, 17 and 22 - 28 under 35 U.S.C. § 103(a) as being unpatentable over Saito *et al.* (U. S. Patent No. 5,731,829), hereinafter 'Saito', in view of Kikuchi (U.S. Patent No. 5,929,854). Claims 6, 11, 16 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Saito in view of Kikuchi and further in view of Silverbrook *et al.* (U.S. Patent No. 6,405,055), hereinafter 'Silverbrook'.

For the reasons set forth more fully below, Applicant respectfully submits that the subject application properly presents Claims patentable over the prior art. Accordingly, reconsideration, allowance and passage to issue are respectfully requested.

As stated previously, the present invention addresses the need in the art for a system or method for reducing the surface area required by office machines generally and printing devices in particular. The invention is a media processing device adapted for support from a vertical structure. The inventive device includes a media processing engine with a photoconductive drum. The media processing engine has a media output oriented to discharge media in a downward direction and a support bracket coupled to the media processing engine. The invention is set forth in Claims of varying scope of which Claim 1 is illustrative.

Claim 1 recites:

1. A media processing device adapted for support from a vertical structure comprising:  
a media processing engine having a **photoconductive drum** and a media output oriented to discharge media in a downward direction and means for supporting said print engine relative to the vertical structure. (Emphasis added.)

None of the references, including those cited but not applied, taken alone or in combination, teach, disclose or suggest the invention as presently claimed. That is, none of the references teach a vertically mounted media processing engine with a photoconductive drum.

In the above-identified Office Action, the Examiner relied heavily on Saito. Saito purports to teach an information processing and recording apparatus with two recording medium conveyance routes. The Examiner suggests that Saito teaches a laser printer. However, Saito's laser is used to heat, and thereby facilitates an ejection of ink. (See col. 27, lines 29 – 35.) Clearly, Saito's printer is an inkjet printer.

In the above-identified Office Action, the Examiner acknowledged that Saito does not disclose a photoconductive drum as set forth in Claims 1 and 14. However, the Examiner suggested that this teaching is provided by Kikuchi and that it would have been obvious to one of ordinary skill in the art to incorporate the photoconductive drum of Kikuchi into the inkjet printer of Saito. The Examiner suggested that one would be motivated to do so to avoid the problems associated with inkjet printing such as nozzle clogging and ink smear.

However, this assertion is tenuous. That is, contrary to the Examiner's assertion, it would not be obvious to one of ordinary skill in the art to substitute a laser printing mechanism for an inkjet printing mechanism. As is well known in the art, laser printers and inkjet printers operate in accordance with fundamentally different technologies. Each offers a unique set of advantages and disadvantages relative to a particular application. If, as suggested by the Examiner, it would be obvious to substitute the inkjet printing mechanism of Saito with the laser printing mechanism of Kikuchi given the so called obvious benefits thereof, there would be no need for inkjet printers at all.


The Examiner's argument misses the point that it is the disadvantages of laser printers relative to Saito's application that make it non-obvious to those of ordinary skill in the art to combine the teachings of these references. For example, a conversion of Saito's printer to a laser printer would require the addition of a photoconductive drum, a transfer drum, toner supply, laser scanning mechanism and numerous other associated components and devices. The drums alone would add significant size and weight to the printer making it impractical relative to Saito's core teaching of a printer integrated into a laptop computer. Laptop computers typically have small form factors and liquid crystal displays (LCDs). The small size of laptop computers is such that laser print mechanism are generally compatible therewith. Further, LCD displays are fragile and, even with a metallic backing, are not typically designed to support the weight and stress of a typical laser printer. Consequently, it would not be obvious to substitute the laser print mechanism of Kikuchi for the inkjet printing mechanism of Saito.

The Examiner went on to suggest that Saito implies that other printers could be used. However, this assertion was made to avoid a limitation of the scope of Saito's claims to printer embodiments shown in the reference. This bald assertion is not sufficient to provide a teaching as to how a laser printer could be used in place of an inkjet printer in the context of Saito's teachings.

Moreover, the mere inclusion of an inkjet print mechanism into the printer of Saito would still fall short of teaching the invention as presently claimed. That is, the combination would still fail to teach a media processing device with means for supporting a print engine with a photoconductive drum relative to a vertical structure as set forth in the present claims.

None of the references, taken alone or in combination, teach, disclose or suggest the invention as presently claimed. Reconsideration, allowance and passage to issue are therefore respectfully requested.

Respectfully submitted,  
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